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Governor

STATE OF NEBRASKA

DEPARTMENT OF AGRICULTURE
GREGORY A. IBACH
Director

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Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS
Station 3C71, 4700 River Rd Unit 118
Riverdale, MD 20737-1238

Dear Dr. DeHaven:

I appreciate the opportunity to comment on the United States Department of Agriculture's Draft Strategic Plan and Draft Program Standards for the National Animal Identification System (NAIS). Of all the current issues facing our agriculture industry, I believe the expeditious development of an animal identification system is one of greatest importance. This is because a successful NAIS has multiple benefits in areas ranging from disease control and foreign trade to consumer confidence in the food supply and Homeland Security.

My comments below serve as a reflection of the input I most commonly receive as I visit with Nebraska agricultural producers. My thoughts won't be universally accepted, but I believe they provide Nebraska as a whole with the best course for moving forward.

Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring, and response system to support federal animal health programs?

While a mandatory identification program will move the agriculture industry forward at a measured pace, producers will resist a forced system; if we don't have acceptance at the grass roots level, the program will not be successful. In addition, if a mandatory system were implemented – particularly if such system were implemented within a short time frame – federal dollars would be necessary in order to help producers comply.

I believe the best option is to have a period of voluntary identification, followed by the adoption of a mandatory system. A voluntary identification program can provide a baseline that is driven by market demand. Once producers see the premiums offered by packers and/or retailers for traceable animals, they will want to implement animal identification. This will improve producer acceptance because they can experience a direct return on their investment in the system.

Furthermore, an initial voluntary phase will allow for natural growth, decreasing the likelihood that the system will be overwhelmed. This progression also will allow for easier resolution of system glitches.

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The switch to a mandatory system will become necessary at some point because, while most producers are driven by markets, that is not the end goal of all animal production. These individuals may not see the necessity of animal identification, but to have a successful disease surveillance, monitoring, and response system, we must achieve universal compliance.

APHIS is requesting comment from stakeholders regarding the utility of a privately managed database for holding animal location and movement information.

It is irrelevant whether a federal, state, or private database – or combination of these – is used. Key to the success of any database will be its ability to meet these considerations:

1. The database must be accessible for producers with operations of all sizes.
2. The database must be accessible by producers who utilize private, herd management software, as well as those that choose not to. Those that keep track of production efficiencies like rate of gain, or specific genetics, may have more readily accessible information, but those that don't incorporate these factors into their herd management shouldn't be forced to use a private system.
3. Costs of database implementation should be born equally by all animal segments and all sizes of operations. Producers who do not have large enough operations to negotiate down the cost of database implementation should not be penalized.
4. Database access for state and federal disease control authorities must be immediate and available at all times. This includes access to any database that may be held by a private entity.
5. The database should be uniform between species to provide for cross tracking of diseases that can affect more than one species.

The federal government will have to develop a general framework for the database in order to have the appropriate uniform fields to make tracebacks workable. However, the framework should provide for state or private adaptability to reconcile regional needs. A system that can trace horses in Kentucky probably would not be effective for Nebraska's feedlots.

Again, I appreciate the opportunity to offer comment on the draft strategic plan. I hope USDA will quickly and thoroughly review all comments received and move forward on behalf of our agriculture production industry.

Sincerely,

DEPARTMENT OF AGRICULTURE



Greg Ibach
Director